

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:20-cr-00054

NEDELTCHO VLADIMIROV

**THIRD SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA  
TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, AND  
REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY**

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 16.1(a) of the Local Rules of Criminal Procedure, and the Arraignment Order and Standard Discovery Request entered by the Court in this case on March 16, 2020, and March 4, 2021, the United States of America, by counsel, herewith responds to each of defendant's Standard Discovery Requests as follows:

**Third Supplemental Response:**

In this case, the United States provides expansive discovery, which has been made available to defense counsel by disc on March 4, 2021, and by email on March 16, 2021. The United States hereby incorporates by reference its prior discovery responses on March 30, 2020 (ECF 34), May 20, 2020 (ECF 38), August 24, 2020 (ECF 48), and further supplements its responses as follows:

**Request H: Disclose to defendant all evidence favorable to defendant, including impeachment evidence, and allow defendant to inspect, copy or photograph such evidence.**

**Response:** The United States is unaware of any such evidence other than that which may otherwise be included herein and in its supplemental responses. As a precautionary measure, the United States discloses that the "boosters" referred to in the charging documents of this case will testify that, at the time of the alleged conspiracies, they were addicted to controlled substances, including but not limited to heroin, and therefore, their memory of the exact details of each financial transaction conducted with the defendant are not always recalled due to the passage of time and the effects of the controlled substances. However, the boosters can testify generally as to parameters of their agreement with the defendant to supply him with stolen items to list and sell on online at a profit to the defendant.

REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY

Pursuant to Rules 16.1(b) and 16.1(d) of the Local Rules of Criminal Procedure, the United States of America requests that defendant provide all applicable reciprocal discovery within 14 days of the service of this response and the provision of materials requested by defendant in the Standard Discovery Request.

Respectfully submitted,

UNITED STATES OF AMERICA

LISA G. JOHNSTON  
Acting United States Attorney

s/Andrew J. Tessman  
ANDREW J. TESSMAN  
Assistant United States Attorney  
WV State Bar No. 13734  
300 Virginia Street, East, Room 4000  
Charleston, WV 25301  
Telephone: 304-345-2200  
Fax: 304-347-5104  
E-mail: [andrew.tessman@usdoj.gov](mailto:andrew.tessman@usdoj.gov)

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "THIRD SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, AND REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY," has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 18th day of **March, 2021** to:

Timothy J. LaFon  
CICCARELLO DELGIUDICE & LAFON  
Suite 100  
1219 Virginia Street East  
Charleston, WV 25301-2912

By: s/ Andrew J. Tessman